

EX PARTE OR LATE FILED



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Carol L. Bjelland
Director
Regulatory Matters

August 26, 1994

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AUG 26 1994

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**EX PARTE: GN DOCKET NO. 94-33:
FURTHER FORBEARANCE FROM TITLE II REGULATION FOR CERTAIN
TYPES OF CMRS PROVIDERS**

Dear Mr. Caton:

On August 25, 1994, representatives of GTE Service Corporation, GTE Airfone, GTE PCS and Contel Cellular met with Gina Harrison, Susan McNeil, D'Wana Speight and Dan Abeyta of the Commission's Staff. The purpose of the meeting was to discuss TOCSIA-related issues in the context of the above-referenced matter. The attached diagrams and discussion outline were used to illustrate points previously raised by GTE in its Comments and Reply Comments filed in the above-referenced docket.

Please include this letter in the record of this proceeding in accordance with the Commission's rules concerning ex parte communications.

Questions concerning this matter should be directed to the undersigned at 463-5292.

Sincerely,

Carol L. Bjelland

CC: G. Harrison
S. McNeil
D. Speight
D. Abeyta
J. Weber

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Terms

- MIN - Mobile Identification Number
- ESN - Electronic Serial Number
- MSC - Mobile Switching Center
- HLR - Home Location Register
- VLR - Visitor Location Register
- AMA - Automatic Message Accounting

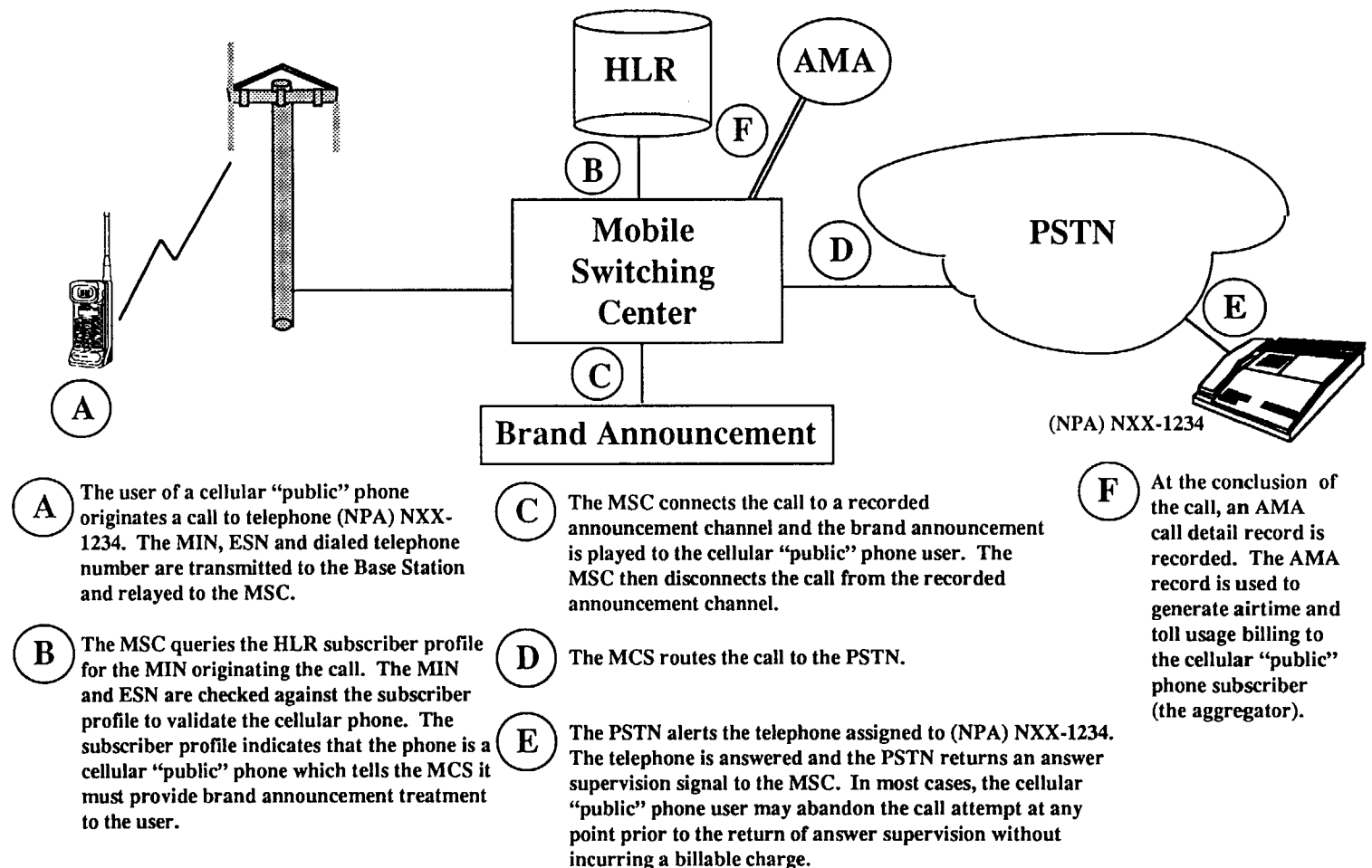
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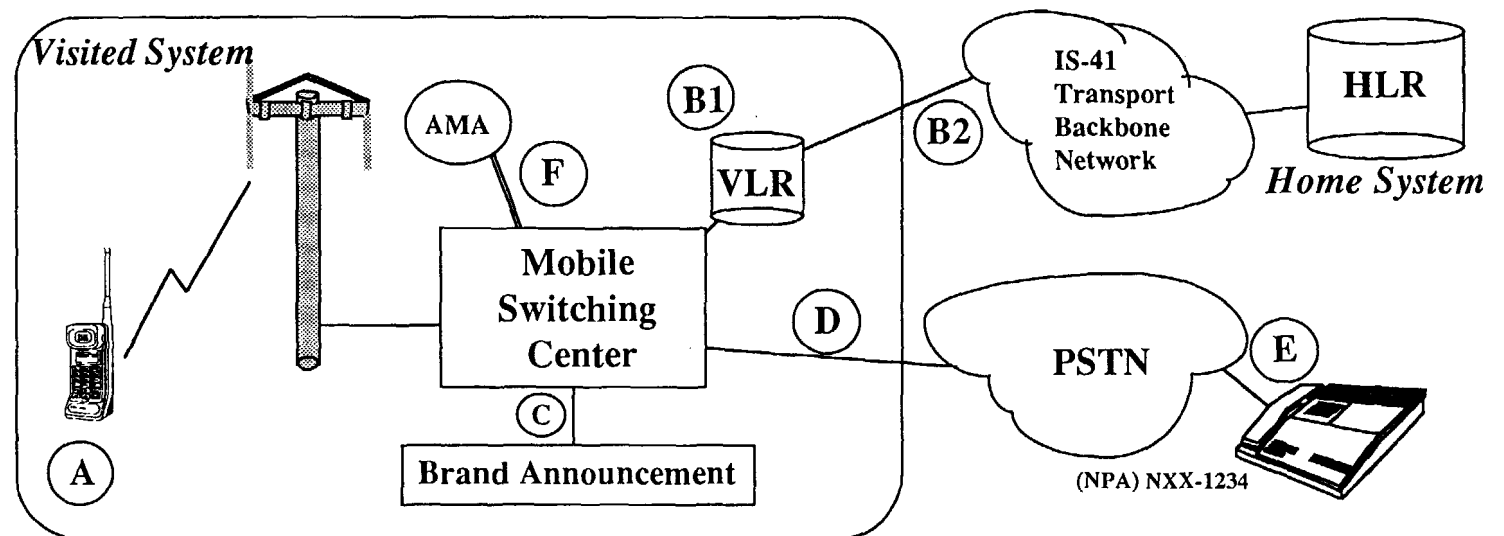
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Scenario 1: Cellular-Originated Call in Home System

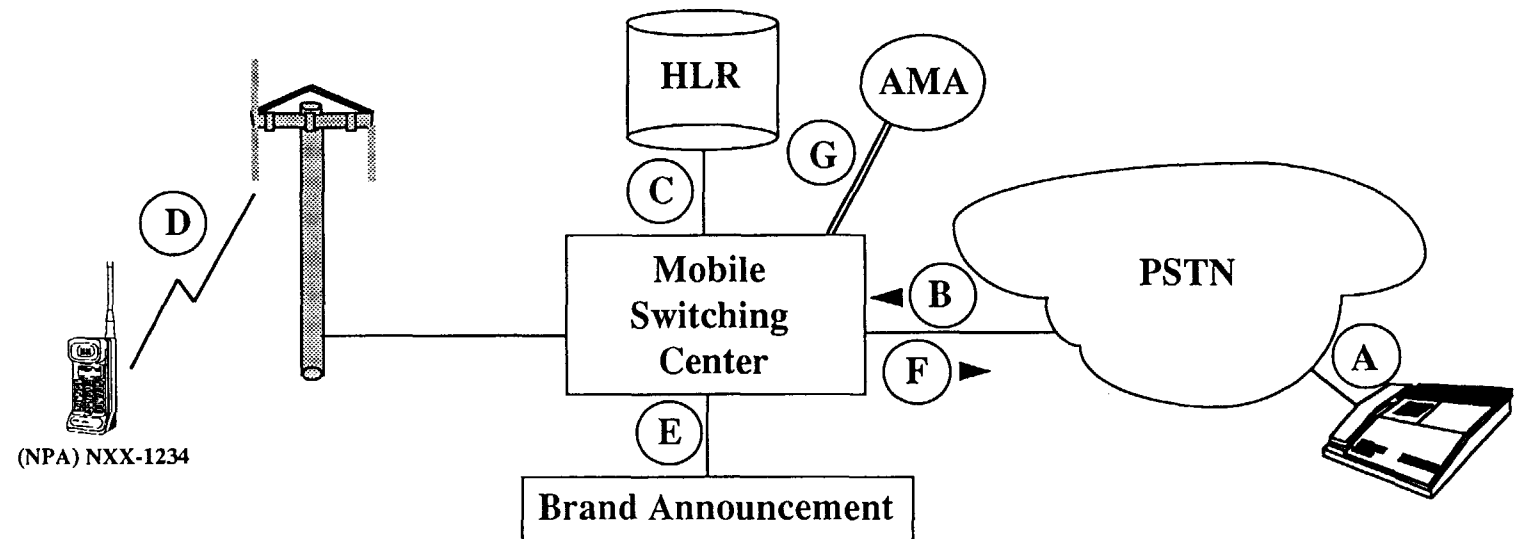


Scenario 2: Cellular Originated Call in Visited System (Roaming)



- A** Same as scenario 1. Assumes that the visited system service provider and the home system service provider have a roaming agreement (roamers can obtain service without special billing arrangements.)
- B1** The MSC queries the VLR to obtain subscriber profile information. No information about the subscriber is found in the VLR. This means that the roamer was not registered in the visited system's VLR before originating this call.
- B2** The VLR queries the "public" phone subscriber's home system to validate MIN and ESN and obtain subscriber profile information. *This communication takes place using a future revision of IS-41 that supports a cellular "public" phone indicator in the subscriber profile.*
- C** Same as scenario 1.
- D** Same as scenario 1.
- E** Same as scenario 1.
- F** Same as scenario 1.

Scenario 3: Cellular Terminated Call in Home System

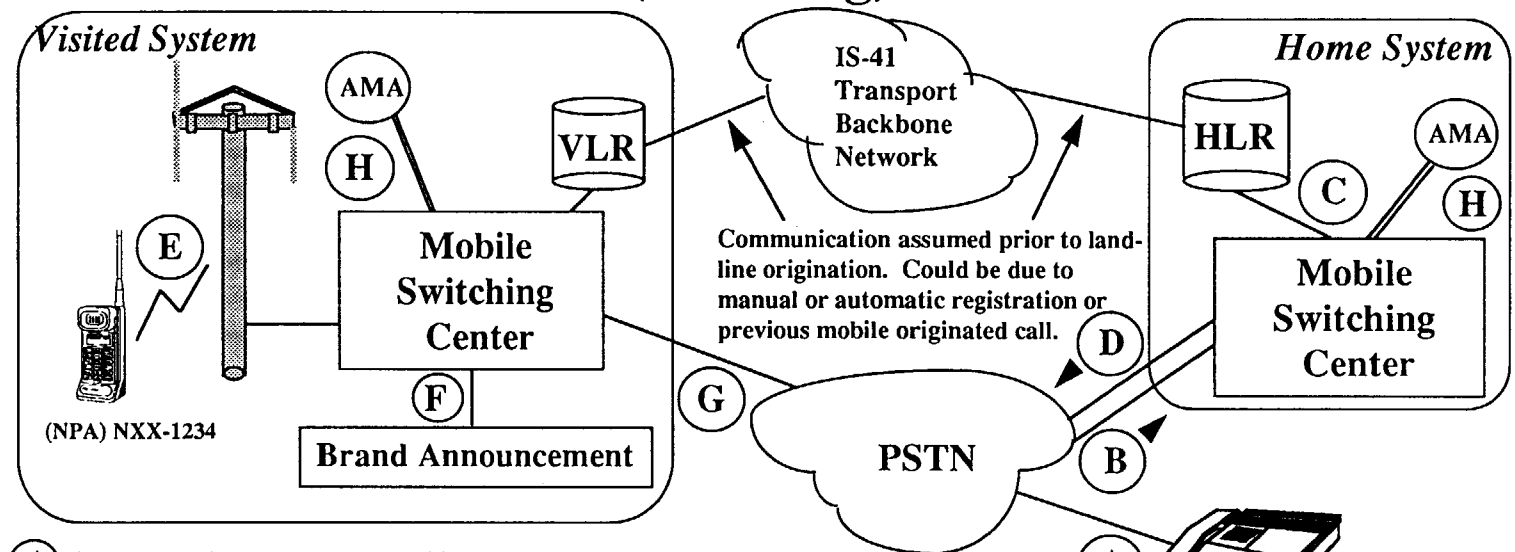


- A** The user of land-line phone originates a call to cellular "public" telephone (NPA) NXX-1234.
- B** The PSTN completes the call to the home MSC of the cellular "public" phone subscriber.
- C** The MSC queries the HLR and determines that the number called belongs to a "public" phone subscriber. The MSC provides suspended call treatment to the originating user.

- D** The MSC pages the cellular phone throughout the system. If the cellular phone is on, it will ring. If the user answers, the MSC will assign the phone to a voice channel.
- E** The MSC connects the cellular "public" phone to a recorded announcement channels and sets a timer. Before the timer expires, the user may hang up and incur no charges.
- F** When the timer expires, the MSC connects the caller to the cellular "public" phone user. *The caller is suspended (waiting) while the cellular "public" phone user listens to the announcement.*

- G** At the conclusion of the call, an AMA call detail record is recorded. The AMA record is used to generate airtime and toll usage billing to the cellular "public" phone subscriber (the aggregator).

Scenario 4: Cellular Terminated Call in Visited System (Roaming)



A Same as scenario 3. Assumes that the visited system service provider and the home system service provider have a roaming agreement and that the cellular 'public' phone user has registered in the visited market, either manually or automatically.

B Same as scenario 3.

C The MSC queries the HLR to find the current status of the cellular phone. The HLR has previously registered the phone in the visited system and has forwarded subscriber profile information. A "public" phone indicator is passed in the subscriber profile in a future revision of IS-41.

D The home MSC connects the caller to the visited MSC via the PSTN. The visited MSC suspends the call.

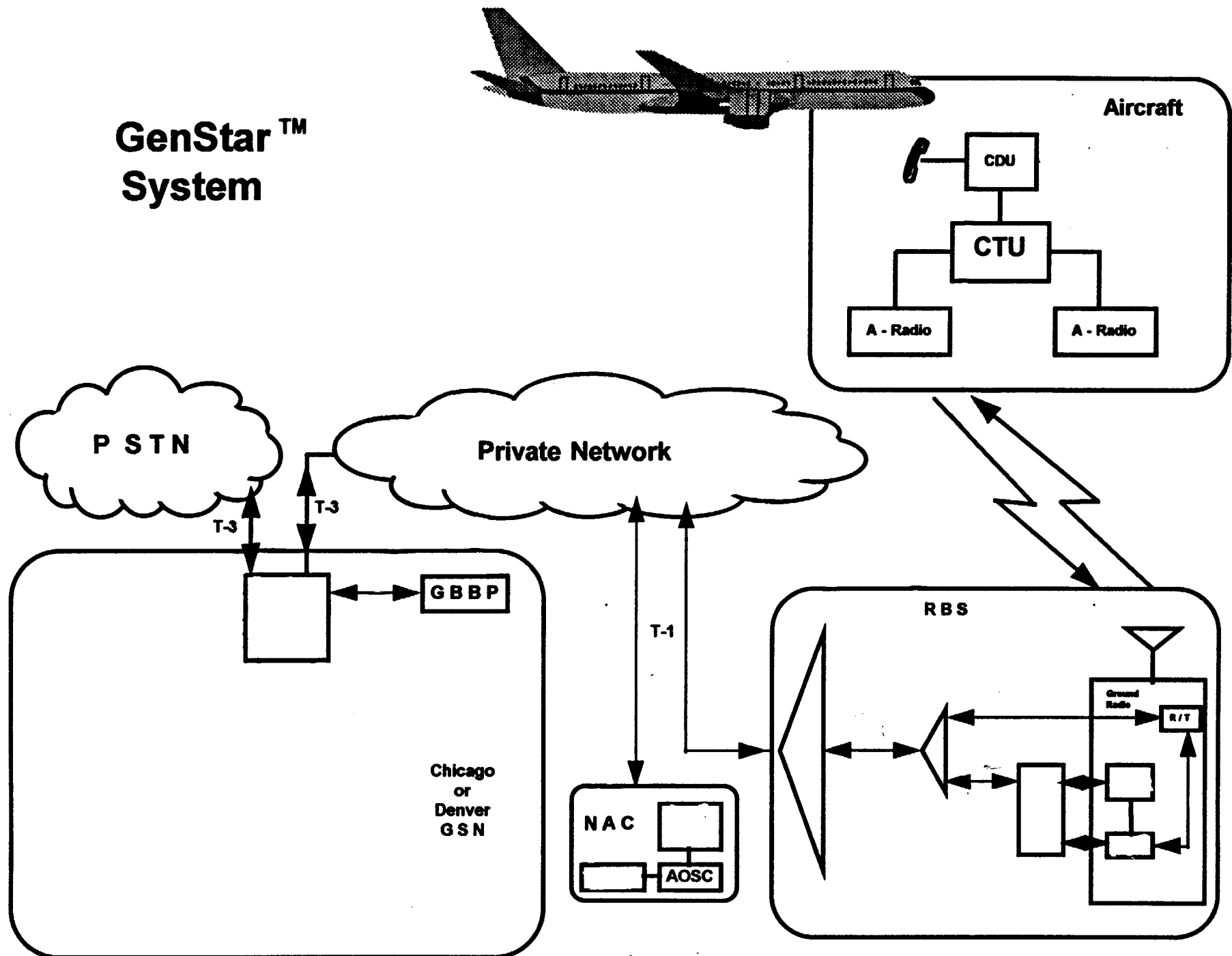
E The MSC pages the cellular phone throughout the system. If the cellular phone is on, it will ring. If the user answers, the MSC will assign the phone to a voice channel.

F The MSC connects the call to a recorded announcement channel and sets a timer. Before the timer expires, the user may hang up and incur no charges.

G When the timer expires, the MSC connects the caller to the cellular "public" phone user. The caller is suspended (waiting) while the cellular "public" phone user listens to the announcement.

H At the conclusion of the call, an AMA call detail record is recorded at both MSCs. The AMA record at the home system is used to generate toll usage billing. The AMA record at the visited system is used to generate airtime billing. The records are combined to generate billing information for the cellular "public" phone subscriber (the aggregator).

GenStar™ System



**COMPLIANCE WITH TOCSIA REQUIREMENTS WOULD BE
BURDENSOME AND CONTRARY TO THE PUBLIC INTEREST**

- CELLULAR CARRIERS (AND IN THE FUTURE, PCS PROVIDERS & ESMRS), IF CLASSIFIED AS OPERATOR SERVICE PROVIDERS, WOULD HAVE TO "BRAND" ALL ROAMER CALLS. THIS CREATES

SIGNIFICANT EXPENSE

CUSTOMER CONFUSION

WASTE OF RF CAPACITY.

- COMPLIANCE WITH TOCSIA REQUIREMENTS WOULD BE IMPOSSIBLE IN MANY CIRCUMSTANCES.

CMRS PROVIDERS COULD NOT REASONABLY COMPLY WITH AN OBLIGATION TO ALLOW CUSTOMERS TO ACCESS BOTH CELLULAR LICENSEES (OR ALL PCS LICENSEES) IN A MARKET, ESPECIALLY IF A CUSTOMER IS ROAMING.

THE UNDERLYING CMRS PROVIDER COULD NOT PROVIDE INFORMATION TO THE CUSTOMER ABOUT ITS RATES, BECAUSE

IT HAS NO DIRECT RELATIONSHIP WITH THE CUSTOMER

DOES NOT SET THE RATES CHARGED TO THE CUSTOMER

COULD NOT ENFORCE COMPLIANCE WITH AGGREGATOR REQUIREMENTS BECAUSE IT HAS NO CONTRACTUAL RELATIONSHIP WITH THE MOBILE PUBLIC PHONE SERVICE PROVIDER.

AIR-GROUND (ATG) PROVIDERS CANNOT TRANSFER CALLS TO OTHER ATG PROVIDERS AS WOULD BE REQUIRED IF ATG CARRIERS WERE CONSIDERED OPERATOR SERVICE PROVIDERS.